

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-CR-245 (NEB/JFD)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	DEFENDANT’S
v.)	SUPPLEMENTAL LIMINE
Muse Mohamud Mohamed,)	MOTION
)	
Defendant.)	

The defendant Muse Mohamud Mohamed, through his attorney Charles F. Clippert, moves the Court for an Order preventing the Government from offering the following evidence.

1. The Government has disclosed a transcript from grand jury testimony from October 14, 2022. The transcript is 55 pages in total. In the questioning after the statements that are the basis for the indictment, Mr. Mohamed is questioned further about the voters at issue. Examples that should be excluded include “Okay. Mr. Mohamed, I’m going to represent to you that that’s not possible because we have spoken to the people on the list and they not only don’t know you, but they did not ask you to be their agent.” (p. 34) The prosecutor makes similar assertions about the evidence on pages 35, 36, 37, 38, 39, 40, and 45. The statements are irrelevant. Fed. R. Evid. 401 and 403. The statements essentially let the prosecutor testify about the case. The prosecutor’s statements should be excluded.

2. The grand jurors asked questions of Mr. Mohamed. Their questions are irrelevant and unfairly prejudicial because they comment on Mr. Mohamed's veracity. Fed. R. Evid. 401 and 403. That is an issue for the petit jury, not a grand jury.

Dated: May 4, 2022

Respectfully submitted,

/s/ Charles F. Clippert
BY: Charles F. Clippert
Attorney for Defendant